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Third-Party Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THE BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE  
TRUST; THE BOARD OF TRUSTEES OF  
THE CONSTRUCTION INDUSTRY AND  
LABORERS JOINT PENSION TRUST; THE  
BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS VACATION TRUST; THE  
BOARD OF TRUSTEES OF SOUTHERN  
NEVADA LABORERS LOCAL 872  
TRAINING TRUST,

Plaintiffs,

vs.

MOHAVE RESTORATION, INC. dba  
SERVICE MASTERS 1<sup>st</sup> RESPONSE, a  
foreign corporation; JEREMIAH L. COX, an  
individual,

Defendants.

THE BOARD OF TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS HEALTH AND WELFARE  
TRUST; et al.

Plaintiffs,

Case No.: 2:16-cv-01190-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
DEFENDANTS/THIRD-PARTY  
DEFENDANTS TO FILE THEIR  
OPPOSITION TO THIRD-PARTY  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT (ECF  
NO. 42)**

(FIRST REQUEST)

ECF No. 45

1 vs.

2  
3 HANOVER INSURANCE COMPANY, a  
4 New Hampshire insurance company; NORTH  
5 AMERICAN SPECIALTY INSURANCE  
6 COMPANY, a New Hampshire insurance  
7 company; DOES 1 THROUGH 10, and ROE  
8 CORPORATIONS 1 THROUGH 10,  
9 inclusive,

10 Defendants.

11  
12 HANOVER INSURANCE COMPANY, a  
13 New Hampshire Insurance company;

14 Third Party Plaintiff,

15 vs.

16  
17 MOHAVE RESTORATION, INC. dba  
18 SERVICE MASTERS 1<sup>st</sup> RESPONSE, a  
19 foreign corporation; JEREMIAH L. COX, an  
20 individual,

21 Third Party Defendants.

22  
23 IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of  
24 record that the Defendants/Third-Party Defendants will have an extension of time  
25 up to and including **February 12, 2018** to file their Opposition to Third-Party  
26 Plaintiff's Motion for Summary Judgment (ECF No. 42), currently due on  
27 January 29, 2018. Counsel for Defendants/Third-Party Defendants has several  
28 other filings due that day and request this extension of time based upon workload  
and to allow sufficient time to prepare their Opposition.

This is the first request for an extension of this deadline. This request will  
not prejudice any party or delay this proceeding given the previously granted  
extension of the dispositive motion deadline to March 9, 2018. (ECF No. 41).

The foregoing constitutes good cause for the extension of the deadline.

Respectfully submitted this 25th day of January, 2018.

Dated: January 25, 2018

**FISHER & PHILLIPS LLP**

/s/ Allison L. Kheel, Esq.  
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Dated: January 25, 2018

**THE URBAN LAW FIRM**

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Dated: January 25, 2018

**JENNINGS STROUSS & SALOMON**

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**ORDER**

Based on the parties' stipulation [ECF No. 45] and good cause appearing, IT IS  
HEREBY ORDERED that the **deadline to respond to the motion for summary  
judgment** [ECF No. 42] is **extended to February 12, 2018**. But counsel is cautioned  
that workload will not likely be considered to be good cause for a second extension of  
time.

  
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U.S. District Judge Jennifer Dorsey  
January 25, 2018